

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA

Plaintiff

v.

M.A. HANNA PLASTICS GROUP, INC.,
WILMINGTON ECONOMIC DEVELOPMENT
CORPORATION AND SIDNEY and CAROL
MAFFETT,

Defendants

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: CIVIL ACTION
: NO. 06-409-GMS
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**DEFENDANT M.A. HANNA PLASTICS GROUP, INC.'S
RESPONSES AND OBJECTIONS TO UNITED STATES OF AMERICA'S SECOND
REQUEST FOR ADMISSIONS TO M.A. HANNA PLASTICS GROUP, INC.**

Defendant, M.A. Hanna Plastics Group, Inc. ("M.A. Hanna") through its counsel, objects and responds to United States' Second Request for Admissions.

GENERAL STATEMENTS

1. Defendant reserves its right to challenge the competency, relevance, materiality and admissibility of, or to object on any grounds to, the use of the information set forth herein and any subsequent proceeding or trial of this or any other action.

2. By making information and/or documents available to all parties, defendant does not waive any objections that it may have regarding all party's use of information or documents, or of the truth or accuracy of any term, characterization contained in these responses. Defendant expressly reserves: (1) all objections regarding the competency, privilege, relevance, materiality,

probative value and admissibility of all information provided, documents produced and the contents thereof; (2) the right to object to plaintiff's and co-defendants' use of any information provided or document produced, in whole or in part, or to the subject matter covered thereby, in later stage of or proceeding in this litigation on any or all appropriate grounds, at any time, to other discovery procedures involving or relating to the subject matter of any information provided or document produced by defendant; and (3) all objections as to vagueness and ambiguity.

3. Defendant reserves its right to challenge the competency, relevance, materiality and admissibility of, or to object on any grounds to, the use of the information set forth herein in any subsequent proceeding or trial of this or any other actions.

4. Defendant responds on its own behalf only, not on behalf of any other entity.

GENERAL OBJECTIONS

Defendant's objections to each of plaintiff's Requests for Admissions are made subject to the following objections and limitations. These general objections are stated herein so as to avoid repeating them in response to each individual Request for Admission. Defendant will cite those objections which are particularly responsive to each Request for Admission and the separate response thereto, but defendant's failure to specifically cite an objection in response to a particular Request for Admission should not be construed as a waiver of said objection.

Defendant hereby objects generally to plaintiff's Request for Admissions to the extent they seek to impose requirements on a greater than those mandated by the Rules.

5. Defendant objects to each Request for Admission to the extent it is vague, ambiguous, and overly broad.

6. Defendant objects to each Request for Admission to the extent it is unduly burdensome and would cause defendant unreasonable time and expense.

7. Defendant objects to each Request for Admission to the extent it is not reasonably calculated to lead to the discovery of material, relevant or admissible evidence.

8. Defendant objects to each Request for Admission to the extent it is not relevant to any claim against, or defense for, defendant.

9. Defendant objects to each Request for Admission to the extent it seeks information subject to the attorney-client privilege, a joint or common defense privilege and the attorney-work product privilege.

RESPONSES TO SECOND REQUESTS FOR ADMISSIONS

1. Admit the genuineness/authenticity of the documents attached, Bates numbered RFA 00000001 through RFA00000064, WEDCO002296 through WEDCO002299 and CBI000017254 through CBI 000017267.

ANSWER:

Denied.

2. The surviving corporation following the May 1978 merger between Electric Hose and Rubber Company, a Delaware Corporation, and Delday, Inc., a Delaware Corporation was Delday, Inc.

ANSWER:

Denied. Electric Hose & Rubber Company, a Delaware Corporation, merged with and into Delday, Inc. under the name of Electric Hose & Rubber Company on May 11, 1978.

3. Delday, Inc. changed its name to Electric Hose and Rubber Company in May 1978.

ANSWER:

Denied. Electric Hose & Rubber Company, a Delaware Corporation, merged with and into Delday, Inc. under the name of Electric Hose & Rubber Company on May 11, 1978.

4. Electric Hose and Rubber Company, formerly incorporated as Delday, Inc., merged into Dayco Corporation, a Michigan Corporation, or about November 29, 1982.

ANSWER:

Denied.

Dated: December 21, 2007

By: /s/ John A. Macconi, Jr. DE ID No. 4430
JOHN A. MACCONI, JR., ESQUIRE
MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN
1220 North Market Street, 5th Floor
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Wilmington, DE 19899-8888
302-552-4300

On behalf of Defendant,
M.A. Hanna Plastics Group, Inc.

OF COUNSEL:

LILA WYNNE, ESQUIRE
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Woodland Falls Corporate Park
200 Lake Drive East, Suite 300
Cherry Hill, NJ 08002
856-414-6000

On behalf of Defendant,
M.A. Hanna Plastics Group, Inc.

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NOTICE OF SERVICE

PLEASE TAKE NOTICE that on December 21, 2007, copies of Defendant, M.A. Hanna Plastics Group, Inc.'s Responses and Objections to United States of America's Second Request for Admissions to M.A. Hanna Plastics Group, Inc. were served on counsel as identified below:

VIA E-FILE AND U.S. MAIL

Patricia C. Hannigan, Esquire
U.S. Attorney's Office
The Nemours Building
1007 Orange Street, Suite 700
Wilmington, Delaware 19899-2046

VIA E-FILE AND U.S. MAIL

Robert W. Whetzel, Esquire
Todd A. Coomes, Esquire
Richards, Layton & Finger PA
One Rodney Square
920 North King Street
Wilmington, Delaware 19801

Dated: December 21, 2007

By: /s/ John A. Macconi, Jr. DE ID No. 4430
JOHN A. MACCONI, JR., ESQUIRE
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